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FILED
Clerk
District Court

MAR - 3 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT
FOR THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

ANTONIO S. CAMACHO

Plaintiff,

vs.

COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS,
MARIANAS PUBLIC LANDS
AUTHORITY, successor to the Marianas
Public Lands Corporation, and
DEPARTMENT OF PUBLIC WORKS,

Defendants.

) CIVIL CASE NO. 05-0043

)
)
)
) PLAINTIFF'S RULE 26(a)
) INITIAL DISCLOSURES

1 Plaintiff, by and through his attorneys, pursuant to L.R. 16.2(c)(J)(d) and
2 Fed.R.Civ.Pro. Rule 26(a), submits the following disclosures:

3
4 **A. Persons With Potentially Discoverable Information**
5

6
7 1. Antonio S. Camacho (will testify as to the circumstances surrounding the
8 alleged taking of land).

9
10 2. As their investigation of potential witnesses is ongoing, Plaintiff reserves the
11 right to disclose any other persons with potentially discoverable information as soon as is
12 practicable. However, other persons known to be likely to have discoverable information in
13 this case are currently, or had been at the time the events in question took place, agents,
14 employees and/or officers of the various defendants.
15

16
17 **B. Description of Relevant Document**
18

19 1. Plaintiff has available for inspection and copying all documents, data
20 compilations, and tangible things that are in its possession, custody and control as required by
21 Rule 26(a) Fed.R.Civ.Pro.
22

23
24 2. These include various publicly recorded documents, articles of correspondence
25 between the parties and the documents generated by the administrative efforts undertaken by
26 Plaintiff to secure compensation for his property that was taken.
27
28

1 3. As Plaintiff's investigation of this matter is ongoing, they reserve the right to
2 supplement this disclosure with descriptions of other relevant documents as soon as is
3 practicable.

4
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6 **C. Computation of Damages**


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8 The damages incurred in this case amount to the actual value of the land taken from
9 Plaintiff. As outlined in Plaintiff's Complaint, Defendant MPLA previously offered an amount
10 to compensate Plaintiff in this matter, but this amount fell far short of the actual value of the
11 property taken. Plaintiff plans to offer expert testimony as to the actual value of the land taken
12 and any computation of such damages will certainly change as interest on the value of the land
13 accrues over time.

14
15
16 **D. Insurance Agreement**

17
18 Plaintiff does not know of any such applicable insurance agreement.

19
20 Dated this 3rd day of March, 2006.

21
22 O'CONNOR BERMAN DOTTS & BANES
23 Attorneys for Plaintiff Antonio S. Camacho

24 By: 
25 Michael W. Dotts (F0150)